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15 Attorneys for Defendant Technologies Displays Americas LLC

16 **UNITED STATES DISTRICT COURT**
17 **NORTHERN DISTRICT OF CALIFORNIA**
18 **SAN FRANCISCO DIVISION**

19 **In re CATHODE RAY TUBE (CRT)**
20 **ANTITRUST LITIGATION**

21 This Document Relates to:

22 *Sharp Electronics Corp. v. Hitachi Ltd.*,
23 *Case No. 13-cv-01173 (JST)*

24 Case No. 07-cv-05944 (JST)
25 MDL No. 1917

26 **DECLARATION OF DONALD A. WALL**
27 **IN SUPPORT OF DEFENDANT**
28 **TECHNOLOGIES DISPLAYS AMERICAS**
29 **LLC'S BRIEF REGARDING SHARP'S**
30 **MOTION FOR ENTRY OF DEFAULT**

31 Donald A. Wall declares as follows:

32 1. I am a member in good standing of the Bar of the State of Arizona and I was
33 granted leave to appear *pro hac vice* in the current litigation. I am a Senior Partner with the law
34 firm Squire Patton Boggs (US) LLP, counsel to Technologies Displays Americas LLC ("TDA")
35 in this litigation. I submit this Declaration in support of TDA's Brief Regarding Sharp's Motion
36 for Entry of Default as to Videocon Industries, Ltd. ("Videocon"). I have personal knowledge of
37 the facts stated herein and could competently testify to these facts if called as a witness.

38 2. Attached hereto as Exhibit A are true copies of pages from Videocon's 2005-2006
39 Annual Report, indicating that Eagle Corporation Limited ("Eagle") became a wholly-owned
40 subsidiary of Videocon on December 13, 2005, and that TDA was a subsidiary of Eagle. P. 4,

41 Declaration of Donald A. Wall in Support of TDA'S
42 Brief Regarding Sharp's Motion for Entry of Default –
43 Case No. 07-cv-05944 (JST) | MDL No. 1917

1 first column, item 1; page 29, item 23(a)(i); p. 33, last column; p. 42 and p. 43, subsidiary chart.

2 3. Attached hereto as Exhibit B are true copies of pages from Videocon's 2006-2007
3 Annual Report, indicating that Eagle was a 100% subsidiary of Videocon, and that TDA was a
4 subsidiary of Eagle. P. 43 (chart).

5 4. Attached hereto as Exhibit C are true copies of pages from Videocon's 2007-08
6 Annual Report, indicating that "Eagle Corporation Limited ceased to be subsidiary of [Videocon]
7 due to dilution and consequently all the subsidiaries of Eagle Corporation Limited ceased to be
8 step down subsidiaries of [Videocon]" as of March 15, 2008 and that Videocon owned 10% of
9 Eagle at September 30, 2008. P. 6, first column, second paragraph under "Subsidiary
10 Companies"; p. 35, item 22(a)(i); p. 50 (chart).

11 5. Attached hereto as Exhibit D are true copies of pages from Videocon's 2013 Annual
12 Report, indicating Videocon's subsidiaries and not including Eagle. P. 61, 77-78.

13 6. Videocon's Annual Reports, the pages of which are attached hereto as Exhibits A-
14 D, are publicly available at the following websites: <https://videoconworld.com/annual-reports>;
15 <http://videoconindustriesltd.com/FinancialAnnualRpt.aspx>.

16 I declare under penalty of perjury that the foregoing is true and correct. Executed on this
17 21st day of July, 2016 in Phoenix, Arizona.

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19 Donald A. Wall
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